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September 2, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA MESSENGER

Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket 98-147

Dear Ms. Salas:

On September 1, 1999 Jeffrey Blumenfeld, General Counsel to Rhythms NetConnections Inc., with Stephen Bowen and Stephanie Joyce of Blumenfeld & Cohen, and Jo Gentry and Tom Stumbaugh of Rhythms NetConnections Inc. met with Commission Staff to discuss issues related to the above-captioned docket.

Commission Staff in attendance were Staci Pies, Stagg Newman, Vincent Paladini, Jerome Stanchine, Paul Marrangoni, Doug Sicker, and Michael Jacobs. The attached document was distributed.

Should you have any questions regarding this filing, please do not hesitate to contact me at (202) 955-6300.

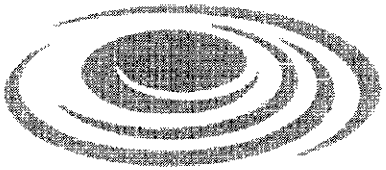
Sincerely,

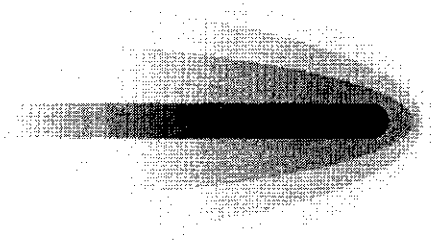
Stephanie Joyce
Associate

Enclosure:

No. of Copies rec'd 0+1
List ABCDE

Spectrum Management for a Competitive Future





RHYTHMS™

Rhythms NetConnections Inc.

Federal Communications Commission Presentation

September 1, 1999

Crosstalk

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- Crosstalk is present for all services, including POTS.
- All services, including POTS, have been designed to perform to specifications in the presence of crosstalk.
- All newer high speed data services have been designed:
  - With legacy loop plant condition in mind
  - To minimize crosstalk between services
  - Not to need special loop plan "management" techniques
- xDSLs do not interfere with POTS.
- As a result, crosstalk does not prevent modern high speed data services from reaching design parameters, or cause data loss.

DSL Design Approaches

- AMI T-1s were the first high-speed data services.
- Echo cancelled and frequency division multiplexed approaches.
- ADSL
- HDSL
- SDSL, IDSL and newer varieties

"Built-In" Spectrum Management

- PSD masks dictate the manner in which technologies perform in the network.
- Services deployed consistent with PSD masks are *all* compatible.
- PSD-compliant xDSL services do not diminish performance below manufacturers' specifications.
- The T1E1.4 Subcommittee Working Group is developing spectrum management "classes" that contain PSD masks and loop deployment guidelines.

T1E1.4 Subcommittee

- National standards are the only acceptable approach.
- ANSI committees have historically done a good job at establishing national standards based on true industry consensus (TR 28, T1.413, T1.601).
- T1E1.4 is defining the "winners" among DSL technologies. ILEC DSL technologies are winning.
- All "guarded services" are acceptable for deployment without restrictions.
- Known disturbers have become "guarded," including repeatered HDSL and AMI T1s.
- T1E1.4 is considering unprecedented deployment restrictions for some DSL technologies; this may impede competition and innovation.

Spectrum Rules

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- Must make technical sense.
- Must not declare technology winners.
- Must be pro-competitive.
- Must not favor/disfavor particular providers.
- Must be issued by the FCC.

FCC Must Declare:

- ADSL, HDSL and IDSL are acceptable for deployment immediately because they have national standards.
- SDSL is acceptable for deployment because it has been successfully deployed.

"Successfully Deployed"

- ILEC proposed implementation of this standard greatly overstates the amount of trial needed to approve a new technology.
- The ILEC proposal is inconsistent with ILEC historical deployment practices for new technologies.
- ILECs presume a technology acceptable if deployed in one central office without interference.
- The FCC should adopt this deployment standard for new DSL services.

Special Loop Management Should Be Prohibited

- Some LECs have proposed special loop plant restrictions: "Binder Group Management" or "Selective Feeder Separation".
- BGM/SFS is unnecessary because manufacturers' designs and PSD masks provide all required spectrum management.
- BGM/SFS is unworkable.
- BGM/SFS is anticompetitive.
- AMI T1s are the noisy exception.

"Significantly degrade"

- This standard is dependent on the manner in which DSL services are described and deployed by the DSL carrier.
- Requiring carriers to deploy DSL services according to their approved PSD masks and manufacturer's standards resolves the service degradation issue.